

APPROPRIATE MANAGEMENT RESPONSE (AMR) POLICIES: A STATE PERSPECTIVE

*Management considerations for
large, long duration wildland fire
incidents in Montana*

Introduction

Appropriate Management Response is defined as, “any specific action suitable to meet fire management unit (FMU) objectives. Typically, the AMR ranges across a spectrum of tactical operations (from monitoring to intensive management actions). The AMR is developed by using fire management unit strategies and objectives identified in the fire management plan. (source: *Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy, June 2003 and referenced in the 2007 Interagency Standards for Fire And Fire Aviation Operations*)

The concept of AMR is based on an evaluation of risks to firefighter and public safety, land and resource and fire management objectives, resource availability, the circumstances under which the fire occurs, including weather and fuel conditions, protection priorities, values to be protected, and cost effectiveness. (NRCG AMR Summary, 2007).

Appropriate Management Response is not entirely new. Fire managers have always sought to develop strategies that are safe, operationally effective and cost effective. The contrast between federal and non-federal approaches to fire suppression appears dramatic

because of the rapidly changing conditions and concerns regarding cost and safety. As a result, federal and state tactics each tend toward opposite ends of the AMR continuum between wildland fire use and full suppression.

The intent of this paper is not to criticize federal fire agencies for the emergence of AMR policies. Rather, it is to communicate some of the challenges of implementing AMR (resulting in less-than-full suppression) for state and local government and offer solutions for moving forward. Certainly, there will continue to be diverging opinions about AMR, but clear communication about the impacts, needs, and intentions of each stakeholder will go a long way toward resolving some of the issues and ultimately, improving implementation of AMR policies.

In 2007, there was a noticeable shift in federal agency interpretation and implementation of AMR. This was driven by a number of factors, among them: continued rising suppression costs, limited resource availability, and extreme conditions that threatened firefighter safety. During the summer of 2007, it was often determined that the appropriate management response for fires which escaped initial attack would be something less than full suppression. This decision, while not without merit, is at times contrary to the mission of state and local fire organizations who are directed under Montana Law to suppress fires to minimize damage to resources and loss of property.

While direct suppression is included in AMR, those activities are focused on perimeter control and point protection for property and high value areas. The Montana DNRC is a full suppression organization, striving to completely suppress all fires at 10 acres or less. The same is true for the vast

network of local partners, fire departments, fire districts and fee service areas. This difference in management approach to wildland firefighting has caused confusion and frustration among federal, state, and local fire agencies, as well as a backlash from private citizens whose homes and property have been threatened or destroyed by wildfires that, in their estimation, were not actively nor aggressively suppressed.

The purpose of this document is to outline key differences between direct suppression agencies such as the Montana DNRC and federal agency interpretation and implementation of AMR, as well as the ramifications to communities, private landowners, and the public stemming from large, long duration fires like the Ahorn, Meriwether, Rombo Mountain, and Sawmill Complex fires of 2007.

Desired outcomes from the dialogue surrounding AMR will be identification of issues and outlining of possible solutions, along with clarification of policies and protocols for resolving conflicts between federal, state and local fire agencies.

The Challenges

The concerns shared by DNRC and local government partners can be categorized into the following areas of emphasis:

- ***AMR in current fire climate (i.e. drought, fuel loading, fire behavior).***
- ***AMR implications for fires in or threatening the WUI,***

and federal discussions of interface suppression responsibilities.

- ***Adequate explanation of AMR and collaborative decision-making between land managers, IMTs, local responders, elected officials, and the public.***
- ***Environmental and public health impacts from large, long-duration fires.***
- ***Communication of intent by federal agencies during development of any/all AMR strategies.***
- ***Conflicting fire management mandates among federal, state and local agencies.***
- ***Impacts of long-duration fires on state and local resources.***
- ***Compensation for losses/costs resulting from point protection, WFU, or other less-than-full-suppression actions.***
- ***State/County fiscal impacts for cost-sharing and/or overall suppression expense from a fire which is not immediately suppressed due to AMR interpretation and/or implementation.***

AMR in the current fire climate:

Already this decade, the State of Montana has seen 4-5 of the worst fire seasons on record. Indices for fire danger, ignition potential, and large fire growth have consistently risen to previously unknown highs, and Montana's deepening drought continues to be a harbinger for more of the

same. Given these conditions, all agencies must critically analyze suppression tactics and consider the potential for fires to spread beyond their intended geographic boundaries.

AMR implications for fires in or threatening the WUI, and federal discussions of interface suppression responsibilities.

The Montana DNRC functions as much like a fire department as a wildland fire agency, and that mission includes protection of private property and critical infrastructure threatened by wildfires. Conversely, the federal agencies are wildland agencies, and there is constant discussion about the appropriateness of federal agencies fighting fires in the interface. In Montana, some of both federal and non-federal lands under federal protection are listed as interface. It is important to note that there is significant federal acreage defined as WUI by communities and counties across the state. Therefore, discussions about changes to structure protection and/or interface suppression activities must include a plan to mitigate the fuel hazard and fire risk on federal holdings within the interface.

Other entities such as local government, state government and the insurance industry must also acknowledge responsibility for hazards in the WUI. Only then can all interests develop comprehensive strategies for dealing with the Wildland Urban Interface.

Adequate explanation of AMR and collaborative decision-making between land managers, IMTs, local responders, elected officials, and the public.

There remains much confusion among many audiences with regard to defining AMR and its implementation. Though not new, the approach to AMR is different from the way state and local governments have historically approached wildland fire suppression. In the absence of full suppression, the public perception is that the government is not taking the necessary steps to protect their homes and property. Internet postings on the Montana Governor's website accuse government entities of deliberately letting fires burn or waiting until they become very large before taking action.

Economic and public health impacts from large, long-duration fires.

The most frequent complaint received from the public during the 2007 fire season was about smoke. While little can be done about it, the fact remains that large, long-duration fires damage the state's air quality and pose a significant health risk to the elderly and those with respiratory illnesses. Long-duration fires also impact local economies negatively because people with health problems that are aggravated by smoke will not visit areas near large fires. There were frequent inquiries about air quality from non-residents who were planning trips to Montana. Education efforts during the fire season are essential in addressing tourism and health related issues.

Communication of intent by federal agencies during development of any/all AMR strategies.

While federal agencies do a commendable job of explaining the resource benefits of

modified suppression, they do not clearly communicate their intent regarding responsibility for protection of private property. Many view ‘point protection’ as a contingency plan for saving homes from a fire that could have been aggressively fought when it was still many miles away. A criticism of federal agencies is that they are not aggressive enough on initial attack.

Conflicting fire management mandates among federal, state and local agencies.

The Montana DNRC is a fire suppression organization. As such, there are expectations that each fire will be suppressed as quickly as possible to protect natural resources and property. While there are circumstances when another strategy is appropriate, the basis for those decisions is the belief that full suppression is always the first consideration. AMR seems to be the opposite: it appears that full suppression is treated as an option to be undertaken only if less aggressive, cheaper options fail. The clash of these two ideologies creates tension among federal, state and local partners.

Impacts of long-duration fires on state and local resources.

The DNRC and its local partners are organized for aggressive initial attack. We contend that the safest, least expensive fire is the one that’s prevented or the one that’s aggressively suppressed at the smallest size possible. Once a fire escapes initial attack, management

decisions are made for extended attack that include releasing IA resources as soon as possible. The main reason for that is to keep them ready to respond effectively to new fire starts.

Long duration fires tie up local resources as well as DNRC staff to the extent that the IA mission can be compromised. Even a supporting role on an incident – as an agency representative, local government contact, or liaison – requires significant time and commitment of resources. Over time this depletes firefighting resources and lessens our ability to respond to new fires.

Compensation for losses resulting from point protection, WFU, or other less-than-full-suppression actions.

While it is difficult to quantify in some instances, there may be a financial impact to communities and private landowners resulting from AMR policies. Even without loss of structures, there are losses such as grazing lands, tourism, recreation, and other infrastructure (i.e. fences) that must be considered. How can the federal government fund economic recovery as a result of fires they don’t actively suppress?

State fiscal impacts for cost-sharing and/or overall suppression expense from a fire with less-than-full suppression.

There are a number of different methodologies used to determine and negotiate cost-share agreements for fires across multiple ownerships and jurisdictions. The ones based on total burned acres have the potential to be impacted by AMR. It can be argued that, for example, federal lands where DNRC has fire suppression responsibility have the potential for cost savings because of DNRC’S aggressive full suppression mandate.

Conversely, the state may inherit a costly fire that becomes a large, long duration incident due, in part, to AMR-related decision-making. Continued discussion on appropriate cost-share strategies is essential.

Common Ground

There continues to be universal agreement among all agencies of the importance of initial attack. While the tactical strategies may vary, all agencies agree that unplanned fire ignitions outside of a wilderness or pre-identified wildland fire use (WFU) area are to be suppressed through aggressive initial attack to the greatest extent possible.

There is also continued agreement regarding containment of large fires where appropriate. These commonalities provide a solid framework for important future dialogue regarding areas of greater disagreement: namely implementation of AMR and some facets of large incident management.

Recommendations

We are fighting wildland fires under significantly different circumstances in the last decade. AMR is the product of the changed environment. With continued pressures to lower fire suppression costs and address safety concerns, it is reasonable to expect AMR policies to be in place for the foreseeable future. There are, however, recommendations for mitigating some of the problems with AMR implementation. Specifically:

- ✓ All agencies need to better explain the concept of AMR

to the public, other wildland fire agencies, elected officials, and other stakeholders. The time to do this is before the incident; clear communication of the policy prior to the process of implementing it is key to gaining understanding.

- ✓ Agencies must involve all potential jurisdictions for any incident. Each must have the opportunity to voice their concerns, opposition, and/or support throughout the AMR decision-making process. ***It is critical that the agencies debunk the popular criticism that AMR is analogous to “let burn”, “wildfire use”, or “prescribed natural fire.”***
- ✓ Policies regarding fire in the wildland urban interface cannot be developed without a comprehensive effort to reduce the fuel hazards and manage growth. Agencies must further clarify structure protection guidelines for fire in the interface. State, local, and private entities must also recognize and take responsibility for their role in WUI issues.
- ✓ Agencies must be transparent in communicating their intent regarding all wildfire incidents. If, from the start, there is no intention of suppressing a fire, all cooperators, stakeholders, and the public need to know.
- ✓ Agencies must develop protocols to resolve disagreement over implementation of AMR and management of large fires.
- ✓ If a suppression strategy includes purposely utilizing state and/or

private lands for fuel breaks or as tactical opportunities, private landowner must be well-informed and, as appropriate, be compensated for losses.

- ✓ Further discussions are needed to address cost-share agreements for large fires where suppression strategies cross jurisdictional boundaries. Specifically, when those strategies include allowing a fire to cross onto state protection as a prerequisite to specific operational activities.

Conclusion

There are several valid reasons for developing AMR policy, among them: firefighter and public safety, resource benefit, cost, and efficiency. But, when AMR implementation contributes to a large, long duration fire, there are ramifications for neighboring ownerships and jurisdictions, air quality, cost, structure protection, and the capability of affected agencies to continue to meet IA missions or other management objectives.

Whenever a new methodology is put into practice, it is reasonable to expect some initial confusion, disagreement and conflict. The implementation of AMR will continue to be an evolving process, made better each time through clear communication, collaboration, public education, and post-incident evaluation. However, an immediate critical need is for better public education regarding AMR and also a

process for receiving and responding to feedback from state and private entities that are impacted by AMR implementation.

The effectiveness of wildland fire suppression across all ownerships is under threat from a number of areas: climate change, forest health, fire behavior, expanding wildland urban interface, and the demand for cost reductions. Appropriate Management Response attempts to create a decision space where wildland fires can be managed in the face of these threats.

As we move forward, we must consider the concerns mentioned in this paper, as well as others which will surely emerge. For all agencies, broad support for fire suppression depends on clear communication of AMR strategies as well as continued cooperative efforts to address the other challenges presented by wildland fire.

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